

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
GWYNN X. KINSEY, JR.,	Plaintiff,	:
- against -		:
THE NEW YORK TIMES COMPANY,	Defendant.	:
<hr/>		X

No. 1:18-cv-12345-VSB

**DEFENDANT’S NOTICE OF MOTION TO
DISMISS AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated March 7, 2019, and all prior papers and proceedings in this action, Defendant The New York Times Company moves this Court, before the Honorable Vernon S. Broderick, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY, 10007, for an order dismissing Plaintiff’s Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6), and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), Plaintiff’s opposition papers must be served on or before March 21, 2019.

Dated: New York, NY
March 7, 2019

Respectfully submitted,

/s/ David E. McCraw _____

David E. McCraw, Esq.
The New York Times Company
Legal Department
620 Eighth Avenue
New York, NY 10018
Phone: (212) 556-4031
Facsimile: (212) 556-4634
Email: mccraw@nytimes.com

*Attorneys for Defendant The New York
Times Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of March, 2019, a true and correct copy of the foregoing **NOTICE OF MOTION** was filed with the Court through the electronic filing system, which will automatically serve electronic notice of the same on all counsel of record.

/s/ David E. McCraw